



Iwan Davies

Director, Energy Assessments

NSW Department of Planning, Housing & Infrastructure (DPHI)

17 August 2026

Subject: Independent Environmental Audit

Dear Iwan,

I am writing in relation to Schedule 4 Conditions 11 and 15 (Independent Environmental Audit) of the Culcairn Solar Farm Development Consent (SSD 10288 – granted on 25 March 2021, and as modified on 22 December 2023), which states that:

11. Independent Audits of the development must be conducted and carried out in accordance with the *Independent Audit Post Approval Requirements (2020)* to the following frequency:
 - (a) within 3 months of commencing construction; and
 - (b) within 3 months of commencement of operations.
15. Independent Audit Reports and the Applicant's response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection as outlined in the *Independent Audit Post Approvals Requirements (2020)* unless otherwise agreed by the Planning Secretary.

This letter relates to the audit report and the Applicant's response to the audit findings which must be submitted within two months of undertaking the audit.

Please find attached the Independent DPHI Compliance Audit SSD-10288 – Culcairn Solar Farm for the audit held on 18 June 2026, prepared by Trigalana Environment Pty Ltd. Please also find Attachment 1 the Summary of audit findings and Attachment 2 the table outlining responses to the audit findings.

Please do let me know if you would like to discuss further.

Kind regards

Somack Zolghadr

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Asset Manager

Neoen Australia

NEOEN AUSTRALIA PTY. LTD.

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Attachment 1: Findings of the audit sourced from section Executive Summary of Independent Audit

Trigalana Environmental Pty Ltd has been engaged to undertake an independent audit of Culcairn Solar Farm, project (the Project) a 350 Megawatt (MW) alternating current (AC) / 440 MWp direct current (DC), photovoltaic (PV) solar farm, located on rural land, approximately 4 kilometres (km) southwest of Culcairn, New South Wales (NSW). Neoen Australia Pty Ltd are the Applicant, Bouygues Construction Australia (BYCA) and Equans Solar & Storage Australia (ESSA) are the Construction Contractors and have been retained for a 2-year operations and maintenance period. Infrastructure Approval (SSD-10288) was granted on the 25 March 2021.

SSD-10288 covers both the construction and operational phases of the Project and requires independent audits to be undertaken in accordance with the Department of Planning, Housing and Infrastructures (DPHI) Independent Post Approval Requirements (2020).

The Audit focuses on the operational phase of the development and included a site inspection, consultation with relevant project stakeholders and a review of management plans, project documents and site records.

The site inspection was undertaken on the 18th of June 2026 with members of Neoen and BYCA present.

The findings of the audit are:

- Construction works are complete, the solar farm is fully operational
- Permanent infrastructure including solar panels, electrical systems, internal roads, drainage, culverts, maintenance facilities, offices and site boundary fencing have been installed
- Site rehabilitation is complete with effective groundcover provided to prevent erosion and dust
- Evidence of the implementation of the various specialist management plans such as emergency, biodiversity etc were observed both in the field with supporting documentation provided to the Auditor as requested
- A total of 46 construction related complaints were received and closed out. No complaints have been received since the commencement of operation. The complaints management system appears to be effective
- Eight incidents have been reported to DPHI during the Audit period relating to small spills (< 5L) and several fires.
- Housekeeping was a high standard. Waste bins and spill kits were available. Small volumes of chemicals were appropriately stored. There was no evidence of pests on site
- Rehabilitation, weeding and landscaping activities appear to be effective with specialist companies appointed to oversee the implementation of maintenance activities.

Substantial compliance with the conditions of consent has been achieved, one non-compliance has been recorded by the Audit relating to the late reporting of environmental incidents. Three recommendations are made relating to the ongoing implementation of the Emergency Response Plan and the placement of environmental protection signage. One key strength has been identified relating to the provision of water supply to respond to fire events.

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Attachment 2: Responses to the Audit Findings

Ref	Condition	Audit Finding	Recommendation	Applicant Response
Sch 2 - 1	a) In meeting the specific environmental performance criteria established under this consent, the Applicant must implement all reasonable and feasible measures to prevent and/ or minimise any material harm to the environment that may result from the construction, operation, upgrading or decommissioning of the development.	Observation As observed during the site inspection, sensitive no go zone signs and flagging for the construction phase of the solar farm remained in place following the completion of the works. Solid fencing surrounding the aboriginal scar tree prevents encroachment and coloured flagging is no longer necessary. Now that the construction activities have been completed, the risk of disturbing these areas is likely to be negligible, however it is noted that the BESS construction activities will result in new construction activities that will require mitigation as applicable in line with the Cultural Heritage Management Plan.	Review the likely environmental impacts associated with the construction of the BESS and amend the location of the sensitive area signage as required.	The Applicant will review the likely environmental impacts associated with the construction of the BESS and amend the location of the sensitive area signage as required.
Sch 3-30	The Applicant must; a) Minimise the fire risks of the development, including managing vegetation fuel loads onsite) Ensure that the development;• Is suitably equipped to respond to any fires on site including provision of a 40,000 litre water supply tank fitted with a 65mm Storz fitting and a FRNSW compatible suction connection located adjacent to an internal access road's) Assist the RFS and emergency services as much as practicable if there is a fire in the vicinity of the site; and Notify the relevant local emergency management committee following construction of the development, and prior to the commencing of operations.	Key Strength This condition requires the provision of a single 40,000L water supply tank. Neoen have gone over and above this requirement and have installed a total of 10 water supply tanks throughout the site, each with 45,000L capacity The water supply tanks were clearly labelled as "Fire Hydrant Water Tanks – 45,000L effective" A water level marker was placed on each of the tanks to monitor water levels. During the construction phase, RFS visited the site frequently with a full day session held on site in October 2025 with over 60 RFS volunteers attending. A video was produced to address fire mitigation risks. FRNSW also attended the site during the construction phases however indicated during the consultation for this Audit that they would like to undertake a further visit now the project is fully operational	While this is noted as a key strength, a recommendation is made to contact the NSW Fire and Rescue Services and arrange a time for a site familiarisation visit as requested during the consultation phase. Annual Bushfire readiness reviews should also continue to be undertaken prior to each bushfire season.	The Applicant will make contact with the NSW Fire and Rescue Services and arrange a time for a site visit in a similar format that what was arranged for the Rural Fire Services local brigades in October 2025.

31	Prior to commencing construction, the Applicant must develop and implement a comprehensive Emergency Plan and detailed emergency procedures for the development in consultation with the owner of the gas pipeline, to the satisfaction of FRNSW and the RFS. The Applicant must keep two copies of the plan on site in a prominent position adjacent to the site entry point at all times. The plan must; a) Be consistent with the Department's Hazardous Industry Planning Advisory Paper No. 1 'Emergency Planning' and RFS's Planning for Bushfire Protection 2019 (or equivalent); b) Identify the fire risks and hazards and detailed measures for the development to prevent or mitigate fires igniting; c) List works that should not be carried out during a total fire ban d) Include availability of fire suppression equipment, access and water; e) Include procedures for the storage and maintenance of any flammable materials; f) Detail access provisions for emergency vehicles and contact details for both a primary	Observation During the Audit period there have been two fires that have been reported to DPHI as incidents. In relation to the grass fire that occurred on 29/12/25, the fire commenced on the afternoon/evening of after 5.30pm, however was not detected until 10 am the next day. While the fire did not spread off site (Neoen noted that this was attributable to effective and compliant vegetation management and the implementation of fire breaks) there was a delay in the detection of the fire which may potentially have led to a broader incident had it spread off site and the emergency services not been promptly notified.	The Bushfire and emergency plan is currently being reviewed, It is recommended as part of the review the systems for fire detection and emergency response are investigated to ensure the early detection and notification of emergency services of fires that occur when the site is unattended. This may include the application of Artificial Intelligence.	The Applicant has updated the Bushfire and Emergency Plans which are currently being reviewed by the FRNSW services for approval. A section addressing the lessons learnt following the fires is included in the Management Plan.
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and alternative site contact who may be reached 24/7 in the event of an emergency; g) Include a figure showing site infrastructure, Asset Protection zone and the onsite water tank; h) Include location of hazards (physical chemical and electrical) that may impact on firefighting operations and procedures to manage identified hazards during firefighting operations; i) Include details of the location, management and maintenance of the Asset Protection zone and who is responsible for the maintenance and management of the Asset Protection Zone; j) Include bushfire emergency management planning; and k) Include details of how the RFS would be notified, and procedures that would be implemented, in the event that; • There is a fire on site or in the vicinity of the site • There are any activities on site that would have the potential to ignite surrounding vegetation; or • There are any proposed activities to be carried out during a bushfire danger period; and • Offer representatives of the local RFS brigade an			
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	opportunity to undertake a site familiarisation following construction of the development, and prior to commencing operations. Following approval the Applicant must implement the Emergency Plan.			
Sch 4-7	The Planning Secretary must be notified in writing via the Major Projects website immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 7.	Non-Compliant During the Audit period, eight incidents were reported to DPHI as follows: • Minor oil and fuel spills (5) • Septic tank leak (2) • Fires (x2) On 3/2/26, DPHI formally responded to the fire nidificating events noting that the fires occurred on the 15 and 29 of December, however the notification was not issued until the 29/1/26. This timeframe does not meet the requirement to notify the incidents immediately. Subsequently DPHI confirmed a breach of this condition has occurred. The Auditor notes that some of the incidents reported (such as minor fuel/ hydraulic spills that were contained on site with effective control and cleanup may not have triggered the definition of a reportable incident in accordance with the conditions of consent.	The following recommendations are made • Review of the incident classification and reporting incident procedure is undertaken to more clearly define incidents that “cause or threaten” material harm in accordance with the conditions of consent • All incidents that meet the definition of material harm including fires are reported to DPHI immediately.	The Applicant will review the incident classification and reporting incident procedure to more clearly define incidents that cause or threaten material harm in accordance with the conditions of consent. The Applicant notes that all incidents that meet the definition of material harm including fires have to be reported to DPHI immediately.